REMARKS

With this Response, claims 31 and 40 are amended. No claims are currently added or canceled. Therefore, claims 31-58 are pending.

ALLOWABLE SUBJECT MATTER

Claims 52 and 57 were objected to as being dependent upon rejected base claims, but would be allowable if rewritten in independent form. Applicants respectfully submit that the rejections to the independent claims 49 and 55, from which claims 52 and 57 depend, respectively, are overcome herein, placing claims 52 and 57 in condition for allowance as written.

CLAIM REJECTIONS - 35 U.S.C. § 103

Claims 31-58 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,434,619 issued to Lim et al. (*Lim*) in view of U.S. Patent No. 5,261,099 issued to Bigo et al. (*Bigo*). Applicants respectfully traverse this rejection as follows.

Claims 31-42

Claim 31 as amended herein recites the following:

> a port to receive a set of configuration parameter change requests within a transaction; and
> a configuration manager coupled to said port to **determine a corrected sequence** for the configuration parameter change requests within the transaction via validation of a change request within the transaction by a module and coupled to the module to **execute the set of configuration parameter change requests in the corrected sequence**.

The Office Action states at page 2 that *Lim* fails to disclose determining a corrected sequence, and cites *Bigo* for this feature. *Bigo* discusses a scheduler to use for synchronizing program tasks of different priority levels. See Abstract; col. 2, line 62 to col. 3, line 30. *Bigo* further discusses selection of requests using a look-up table to determine whether a sequence of bits is a

valid combination. See col. 14, line 19 to col. 15, line 50. Applicants do not concede that *Bigo's* sequence of bits can be understood as a sequence of configuration parameter requests. Whether or not *Bigo* discloses determining a valid sequence of bits, *Bigo* at most can be understood as disclosing determining a "correct" sequence of bits. This is in contrast to the claimed invention, which recites: "determine a **corrected** sequence for the configuration parameter change requests...." Whether or not *Bigo* determines that the order of the sequence of bits is valid, or "correct," *Bigo* fails to disclose or suggest correcting the sequence. In fact, in each example in *Bigo* discussing determining if a valid sequence of bits has been received, if the sequence is determined to be invalid, "a branch is done to 'MODEM RESET' program." Col. 14, line 45; col. 14, lines 53-54; col. 14, lines 61-62; col. 15, lines 12-13; col. 15, lines 23-24; col. 15, lines 45-46. Thus, if *Bigo* detects an invalid sequence of bits, it aborts. In contrast, the claimed invention recites executing the set of configuration parameter change requests in the corrected sequence. Thus, *Bigo* fails to disclose what is asserted in the Office Action, and so fails to cure the deficiencies of *Lim*. Thus, the references, whether alone or in combination, fail to disclose or suggest at least one element of the claimed invention, and so fail to support an obviousness rejection under MPEP §2143.

Claims 32-42 depend from claim 1. Because dependent claims necessarily include the limitations of the claims from which they depend, Applicants submit that these claims are not rendered obvious by the cited references for at least the reasons set forth above with respect to claim 31.

Claims 43-58

The rejection of claims 43-58 is improper at least because the Office Action has not set forth a complete rejection of the claims. Claim 43 recites the following:

receiving multiple configuration parameter change requests within a
configuration parameter change request transaction;

determining whether the received configuration parameter change request
within the transaction are in an order capable of sequential execution;

re-ordering the requests to be in an order capable of sequential execution,
if the requests are determined not to be in such an order; and

executing the configuration parameter change requests in the order to
assign change-requested values to run-time variables.

Claim 49 includes a limitation similarly directed to re-order the requests. Claim 55 recites an

element directed to place requests in an order capable of sequential execution. The Office

Action fails to address the limitation of claims 43 and 49 of **re-ordering requests** to be in and

order capable of sequential execution, or the limitation of claim 55 of **placing requests** in an

order capable of sequential execution, and fails to point to any teachings in the cited references

that are purported to disclose these limitations. Applicants note that with regard to claim 55, the

Office Action at page 6 cites *Bigo* at col. 15, line 45 to col. 16, line 5 as disclosing "determining

whether received requests are capable of sequential execution," but this fails to address the

limitations of the claimed invention mentioned above of re-ordering requests and placing

requests in an order. Thus, at least these elements of the claims are not addressed in the Office

Action. Applicants are unable to respond to an incomplete rejection. Applicants therefore

respectfully request that the rejection of these claims be withdrawn, or that the portion of the

cited references asserted to disclose these limitations be set forth with particularity to allow

Applicants an opportunity to respond.

Claims 44-48, 50-54, and 56-58 depend from independent claims 43, 49, and 55,

respectively, and so necessarily include the limitations of the independent claims. The rejection

of these dependent claims was based on the improper rejection of the independent claims, and is

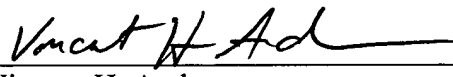therefore necessarily also improper.

CONCLUSION

For at least the foregoing reasons, Applicants submit that the rejections have been overcome, placing all pending claims in condition for allowance. Such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

> Respectfully submitted,
> **BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN, LLP**

Date: 9/30/04

Vincent H. Anderson
Reg. No. 54,962

12400 Wilshire Blvd., 7th Floor
Los Angeles, CA 90025-1026
Telephone: (503) 439-8778